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18 *Attorneys for Defendant, Epic Systems Corporation*

19 UNITED STATES DISTRICT COURT

20 NORTHERN DISTRICT OF CALIFORNIA

21 CureIS Healthcare, Inc.,

22 Plaintiff,

23 vs.

24 Epic Systems Corporation,

25 Defendant.

Case No. 3:25-cv-04108-MMC

**JOINT STIPULATION REGARDING
FILING OF AMENDED COMPLAINT,
RESPONSE DEADLINE, AND
REQUESTS TO EXTEND DEADLINES**

1 Plaintiff CureIS Healthcare, Inc. (“Plaintiff”) and Defendant Epic Systems Corporation
2 (“Defendant”), by and through their undersigned counsel, hereby state as follows:

3 WHEREAS, Defendant filed a Notice of Motion and Motion to Transfer Venue to the
4 Western District of Wisconsin Pursuant to 28 U.S.C. § 1404(a) (“Motion to Transfer”) on June 17,
5 2025 (Dkt. No. 22) and Plaintiff filed its opposition to the Motion to Transfer on July 1, 2025 (Dkt.
6 No. 28);

7 WHEREAS, Defendant’s current deadline to file its reply in support of its Motion to Transfer
8 is July 8, 2025 and a hearing is scheduled on the Motion to Transfer on July 25, 2025;

9 WHEREAS, the parties have conferred and agreed upon deadlines they believe are
10 appropriate for Defendant to file its reply in support of its Motion to Transfer in consideration of
11 the upcoming July 4 holiday and the hearing date on the Motion to Transfer in light of Plaintiff’s
12 counsel’s personal obligations on that date;

13 WHEREAS, Defendant filed a Notice of Motion and Motion to Partially Unseal Plaintiff’s
14 Complaint (“Motion to Unseal”) on June 30, 2025, with a noticed hearing date of August 8, 2025
15 (Dkt. No. 26);

16 WHEREAS, Plaintiff’s current deadline to oppose Defendant’s Motion to Unseal is July 14,
17 2025 and Defendant’s deadline to file a reply in support of its Motion to Unseal is July 21, 2025;

18 WHEREAS, Defendant’s current deadline to respond to the Complaint is July 14, 2025;

19 WHEREAS, Plaintiff intends to file an amended Complaint (“Amended Complaint”)
20 pursuant to Fed. R. Civ. P. 15(a)(1)(B) on or before July 14, 2025;

21 WHEREAS, the parties have conferred and agreed upon deadlines they believe appropriate
22 for Plaintiff to file its opposition to Defendant’s Motion to Unseal and Defendant’s reply in support
23 of its Motion to Unseal, given Plaintiff’s intention to file an amended Complaint on or before July
24 14, 2025, the same day as its opposition to the Motion to Unseal is due;

25 WHEREAS, the parties have conferred and agreed upon deadlines they believe appropriate
26 for Defendant to move to dismiss the Amended Complaint (“Motion to Dismiss”), and a briefing
27 schedule and hearing date for Defendant’s Motion to Dismiss, because Plaintiff intends to amend to
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1 add one or more claims to its Complaint, and to expand on certain allegations already included in
2 the current Complaint;

3 WHEREAS, the parties have not obtained any previous extensions for the aforementioned
4 deadlines set forth above.

5 NOW THEREFORE, the parties hereby believe the above establishes good cause to support
6 their stipulation and agreement that:

- 7 1. Defendant shall file its reply in support of its Motion to Transfer on or before
8 July 10, 2025.
- 9 2. The Motion to Transfer hearing scheduled for July 25, 2025 shall be
10 continued to August 8, 2025.
- 11 3. Plaintiff shall file its opposition to Defendant's Motion to Unseal on or before
12 July 18, 2025.
- 13 4. Defendant shall file its reply in support of its Motion to Unseal on or before
14 July 25, 2025.
- 15 5. Plaintiff shall file its Amended Complaint on or before July 14, 2025.
- 16 6. Defendant shall file its Motion to Dismiss on or before September 12, 2025.
- 17 7. Plaintiff shall file its opposition to Defendant's Motion to Dismiss on or
18 before October 27, 2025.
- 19 8. Defendant shall file its reply in support of its Motion to Dismiss on or before
20 November 17, 2025.
- 21 9. The Motion to Dismiss hearing shall be noticed for December 5, 2025.

22 IT IS SO STIPULATED.

23 DATE: July 3, 2025

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

25 By /s/ Adam B. Wolfson

26 Adam B. Wolfson
27 *Attorneys for Plaintiff*
28

1 DATE: July 3, 2025

CRAVATH, SWAINE & MOORE LLP

2
3 By /s/ Lauren A. Moskowitz

Lauren A. Moskowitz

Attorneys for Defendant

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

2 Dated: _____

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4 By: _____

5 Hon. Maxine M. Chesney

6 Senior United States District Judge
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